

Fill in this information to identify the case:

Debtor 1 Allison J. Forgyson

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of PA
(State)

Case number 1:19-bk-05173-HWV

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Pingora Loan Servicing, LLC Court claim no. (if known): 7

Last 4 digits of any number you use to identify the debtor's account: *****4211

Property address: 1821 Lexington Avenue
Number Street

Middletown PA 17057
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 03 / 01 / 2025
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ 0.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM / DD / YYYY

Debtor 1

Allison J. Ferguson

First Name

Middle Name

Last Name

Case number (if known) 1:19-bk-05173-HWV**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x /s/ Wendy Locke

Signature

Date 02 / 20 / 2025

Print

Wendy Locke

First Name

Middle Name

Last Name

Title Agent for Creditor

Company

Aldridge Pite, LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address

3333 Camino del Rio South, Suite 225

Number

Street

San Diego

City

CA 92108

State

ZIP Code

Contact phone

(858) 750 - 7600Email wlocke@aldridgepite.com

Certificate of Service

I hereby certify that a copy of the foregoing Response to Notice of Final Cure Payment was served on the parties listed below by postage prepaid U.S. Mail, First Class or served electronically through the Court's ECF System at the e-mail address registered with the Court on

Date: February 20, 2025

Chapter 13 Trustee: Jack N Zaharopoulos
Trustee Address: Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
Trustee Email: info@pamd13trustee.com

Debtor's Counsel Name: Kara Katherine Gendron
Debtor's Counsel Address: Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
Debtor's Counsel Email: karagendron@gmail.com

Debtor 1 Name: Allison J. Forguson
Debtor's Mailing Address: 1821 Lexington Avenue
Middletown, PA 17057

/s/ Ciara M. Pumicpic